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Attorney for Material Witnesses:

MING ZHOU ZHU  
LIANGNENG JIANG  
YUHAI WANG  
XUZAI DONG  
LIQIU LIN

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA  
(Honorable RUBEN B. BROOKS)

UNITED STATES OF AMERICA,	)	CRIMINAL CASE 08CR0369-JLS
	)	MAGISTRATE CASE 08MJ8096-PCL
	)	DATE: March 13, 2008
	)	TIME: 9:00 A.M.
Plaintiff,	)	COURTROOM B
	)	
v.	)	NOTICE OF MOTION
	)	AND MOTION FOR ORDER
CHEONG SAU WONG,	)	SETTING VIDEO DEPOSITION
XU JUN LEE	)	OF MATERIAL WITNESSES
	)	MING ZHOU ZHU
	)	LIANGNENG JIANG
	)	YUHAI WANG
	)	XUZAI DONG
	)	LIQIU LIN
	)	
Defendants.	)	
	)	

TO: ALL NAMED PARTIES AND THEIR ATTORNEYS and ASSISTANT UNITED STATES ATTORNEY, Attorney for Plaintiff, THE UNITED STATES.

PLEASE TAKE NOTICE that on Thursday, March 13, 2008 at 9:00 A.M. in the Courtroom of the Honorable RUBEN B. BROOKS, or as soon thereafter as counsel may be heard, the material witnesses, MING ZHOU ZHU, LIANGNENG JIANG, YUHAI WANG, XUZAI DONG, and LIQIU LIN, by

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1 and through counsel, AL SMITHSON, will bring the above entitled  
2 motion.

3  
4 MOTION

5 The material witnesses, MING ZHOU ZHU, LIANGNENG JIANG, YUHAI  
6 WANG, XUZAI DONG, and LIQIU LIN, by and through counsel, AL  
7 SMITHSON, and pursuant to Rule 15(a) of the Federal Rules of  
8 Criminal Procedure, and pursuant to 18 U.S.C. Section 3144, moves  
9 for an order to secure a video deposition of testimony of these  
10 material witnesses pending trial, and for an Order for release from  
11 custody immediately thereafter.

12 This motion will be made on the grounds that these witnesses  
13 are unable to meet any condition of release and that their testimony  
14 can be adequately secured by deposition and that detention is not  
15 necessary to prevent a failure of justice and that further detention  
16 imposes a severe hardship on the witnesses and their families.

17 This motion will be based upon the Declaration of Attorney AL  
18 SMITHSON, the Memorandum of Points and Authorities in support of  
19 this motion, and all documents and records on file herein, and upon  
20 such oral testimony as the Court may deem proper.

21  
22 DATED: February 26, 2008

23  
24 /s/ Al Smithson  
25 AL SMITHSON, Attorney for  
26 MING ZHOU ZHU  
27 LIANGNENG JIANG  
28 YUHAI WANG  
XUZAI DONG  
LIQIU LIN